

The Honorable John Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ATM SHAFIQU KHALID, an individual,

Plaintiff,

v.

CITRIX SYSTEMS, INC., a Delaware
corporation with branch office in Washington,

Defendant.

No. 2:16-cv-00650-JCC

DEFENDANT'S RESPONSE TO
NOTICE REGARDING DOCKET
NO. 25 (PLAINTIFF'S
ACCOUNTING OF ATTORNEY'S
FEES AND ANY COSTS)

Defendant Citrix Systems, Inc. ("Citrix") respectfully requests that plaintiff's accounting total of \$18,460 be reduced to \$17,470 due to what appears to be a mathematical error. There are 35 hours of attorney time reported at \$495/hour (\$17,325) and one hour of paralegal time at \$145/hr. The total accounting based on these reported hours should be \$17,470 (\$17,325 + \$145).

For purposes of this accounting only, Citrix accepts plaintiff's counsel claimed hourly rate of \$495 as reasonable. However, Citrix notes that the comparison to the national median rate for intellectual property litigators fails to include the geographical and firm size reductions of approximately 19% warranted by the data plaintiff submitted from the American Intellectual Property Law Association. Moreover, as plaintiff's case is in essence an employment dispute arising from an alleged breach of an employment agreement, the comparison to intellectual property litigation rates is not appropriate in any event.

1 Without waiver of Citrix's concern regarding reasonable hourly rates, Citrix
2 respectfully requests that plaintiff's accounting be reduced by \$990 to a total of \$17,470 to
3 accurately reflect the total number of hours reported as worked.

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5 DATED this 3rd day of August, 2016.

6 Davis Wright Tremaine LLP
7 Attorneys for Citrix Systems, Inc.

8 By 
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DECLARATION OF SERVICE


I hereby declare under penalty of perjury under the laws of the United States of America that on this date I caused to be served the foregoing on the following by the method indicated:

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- ☐ Via U.S. Mail
- ☐ Via Electronic Mail

Attorney for Plaintiff ATM Shafiqul Khalid

DATED this 3rd day of August, 2016.


Gail Kataoka